

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS O'HARA
TO INTERROGATORIES OF DOUGLAS CARLSON
(DFC/USPS-T30-1 THROUGH 7)**

The United States Postal Service hereby files the response of witness O'Hara to the following interrogatory of Douglas Carlson, filed August 4, 1997: DFC/USPS-T30-1 through 7.

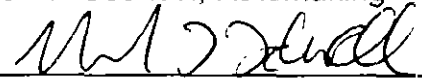
The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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August 18, 1997

**RESPONSE OF POSTAL SERVICE WITNESS O'HARA TO THE
INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-T30-1. Please provide the cost coverage for First-Class Mail letters and First-Class Mail single-piece letters that was approved in Docket No. R94-1.

RESPONSE:

The Commission's recommended cost coverage for First-Class Mail letters in Docket No. R94-1 was 174.5% (Opinion and Recommended Decision, Appendix G, Schedule 1). As far as I am aware, the Commission did not specifically recommend a cost coverage for the single-piece portion of the First-Class Mail letters subclass.

**RESPONSE OF POSTAL SERVICE WITNESS O'HARA TO THE
INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-T30-2. Please provide the cost coverage for First-Class Mail cards and First Class Mail single-piece cards that was approved in Docket No. R94-1.

RESPONSE:

The Commission's recommended cost coverage for First-Class Mail cards in Docket No. R94-1 was 136.7% (Opinion and Recommended Decision, Appendix G, Schedule 1). As far as I am aware, the Commission did not specifically recommend a cost coverage for the single-piece portion of the First-Class Mail cards subclass.

**RESPONSE OF POSTAL SERVICE WITNESS O'HARA TO THE
INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-T30-3. Please provide the cost coverage for single-piece First-Class Mail letters that the Postal Service is proposing in Docket No. R97-1.

RESPONSE:

The Postal Service is proposing a cost coverage only for the entire First-Class Mail letters subclass, not for single-piece portion of the subclass. However, the proposed coverage for the entire subclass, combined with witness Frank's rate design, does result in an implicit cost-coverage for the single-piece portion; this is shown on line 2 of Exhibit USPS-30B.

**RESPONSE OF POSTAL SERVICE WITNESS O'HARA TO THE
INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-T30-4. Please provide the cost coverage for First-Class Mail single-piece cards that the Postal Service is proposing in Docket No. R97-1.

RESPONSE:

The Postal Service is proposing a cost coverage only for the entire First-Class Mail cards subclass, not for single-piece portion of the subclass. However, the proposed coverage for the entire subclass, combined with witness Fronk's rate design, does result in an implicit cost-coverage for the single-piece portion; this is shown on line 5 of Exhibit USPS-30B.

**RESPONSE OF POSTAL SERVICE WITNESS O'HARA TO THE
INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-T30-5.

- a. Please confirm that the rate for mailing a single-piece post card on July 1, 1994, was 19 cents.
- b. Please confirm that the rate for mailing a single-piece post card on July 1, 1997, was 20 cents.
- c. Please explain your statement at page 26, lines 3-5, that the current case represents "the first overall increase in card rates since Docket No. R90-1."

RESPONSE:

- a-b. Confirmed.
- c. Clearly, this is a misstatement. I will amend that sentence of my testimony to read "However, in view of the fact that the overall increase in card rates since Docket No. R90-1 is significantly below average, the effect of this increase on mailers is clearly acceptable (criterion 4)."

**RESPONSE OF POSTAL SERVICE WITNESS O'HARA TO THE
INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-T30-6. Please provide all data reporting the average delivery time for Priority Mail and the percentage of the time in which Priority Mail is delivered in accordance with the Postal Service's two- or three-day service standards. Please provide all background material that would be necessary for a person to understand the data.

RESPONSE:

The Postal Service will file non-privileged national summaries of quarterly FY 1996 ODIS time-in-transit statistics in USPS Library Reference H-234.

**RESPONSE OF POSTAL SERVICE WITNESS O'HARA TO THE
INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-T30-7. Please refer to your testimony at page 37, lines 9-10.
Please confirm that a mailer still can deposit a Parcel Post parcel weighing three pounds in a collection receptacle if the parcel bears metered postage. If you do not confirm, please explain your answer fully.

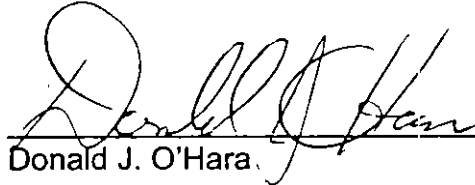
RESPONSE:

Confirmed; although stamped Parcel Post has lost its former access to the collection system, metered Parcel Post may still utilize this system.

DECLARATION

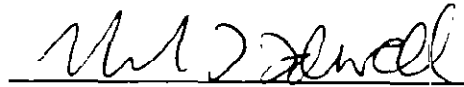
I, Donald J. O'Hara, hereby declare, under penalty of perjury, that the foregoing Docket No. R97-1 interrogatory responses are true to the best of my knowledge, information, and belief.

8-18-97
Date


Donald J. O'Hara

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

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